

COVINGTON & BURLING LLP

Mr. Jeff S. Jordan, Esq.
August 25, 2014
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I. AKT Development Corporation ("AKT")

The sole allegation in the complaint as to AKT is that Mr. Demos mailed his statement of candidacy and the Friends of George Demos campaign committee's registration statement from AKT. It is not a violation of the Act for a candidate to mail these documents from a business location and, in fact, many do.

We have discerned no other allegation in the complaint against AKT. We have also discerned no other allegations involving AKT in the press articles attached to the complaint. While at least three Commissioners have taken the position that press reports accompanying a complaint do not, in and of themselves, constitute a sufficient basis for the Commission to find a reason to believe ("RTB") a violation of the Act occurred, *see* MUR 5878, (Arizona State Democratic Central Committee), Statement of Reasons, Commissioners Donald F. McGahn, Caroline C. Hunter, and Matthew S. Petersen, we nevertheless reviewed the articles for potential allegations. There is nothing in the news articles attached to the complaint alleging AKT's further involvement in this matter.

Because there are no allegations that AKT engaged in conduct that would constitute a violation of the Federal Election Campaign Act ("the Act"), this matter should be closed as to AKT.

II. Angelo Tsakopoulos

The complaint alleges that i) unsourced press reports say Mr. Tsakopoulos gave the Demos campaign \$2,000,000 and, in the alternative, that ii) Mr. Demos told the complainant the funds were coming "through" Mr. Tsakopoulos, that Mr. Tsakopoulos would "give" him the funds, and that the funds were "from his wife's family." None of this is based upon personal knowledge. It is hearsay, conjecture, and speculation.

Mr. Tsakopoulos contributed \$2,600 to the Committee for the primary election and \$2,600 for the general election. *See* Decl. of Angelo Tsakopoulos ¶ 2 (Exh. 1). These contributions were made on December 30, 2013 and reported on the Friends of George Demos campaign committee's Year-End Report filed on January 31, 2014 and amended April 12, 2014. Beyond this amount, Mr. Tsakopoulos did not give, loan, or donate any additional funds to the Committee or Mr. Demos, personally, to support the Demos campaign. *See id.* ¶ 3.

The complainant has no factual basis upon which to claim that Mr. Tsakopoulos contributed \$2,000,000 to the Committee. Mr. Tsakopoulos denies this allegation.

Based upon the undisputed factual record in the circumstances presented here, the FEC should close this matter as to AKT Development Company and Mr. Tsakopoulos without further action.

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Respectfully Submitted,



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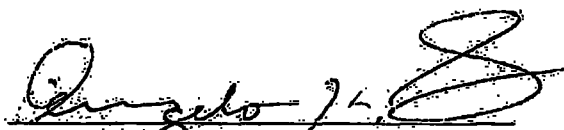
BEFORE THE FEDERAL ELECTION COMMISSION

In re MUR 6848

DECLARATION OF ANGELO TSAKOPOULOS

1. My name is Angelo Tsakopoulos. I am the Chairman of AKT Development Corporation, also a named respondent in this matter. This declaration is made upon my personal knowledge and belief.
2. On December 30, 2013, I contributed \$2,600 to Friends of George Demos for the primary election and \$2,600 for the general election.
3. I made no additional contributions to Friends of George Demos, nor did I make a gift, loan, or donation to George Demos personally for the purpose of supporting the Demos campaign.

I declare under penalty of perjury that the foregoing is true and correct.


Angelo Tsakopoulos

Date: 8-25-14